

NARRATIVE INFORMATION SHEET

1. APPLICANT: Jackson County, Michigan
2. FUNDING REQUESTED:
 - a. ASSESSMENT GRANT TYPE: Community Wide
 - b. FEDERAL FUNDS REQUESTED: \$300,000
 - c. CONTAMINATION: Hazardous Substance and Petroleum
3. LOCATION: Jackson County, Michigan
4. PROPERTY INFORMATION FOR SITE SPECIFIC PROPOSAL – N/A
5. CONTACTS
 - a. PROJECT DIRECTOR: Ms. Amy Guerriero
(517) 788-4455
aguerriero@enterprisegroup.org
100 E. Michigan Avenue, Suite 1100
Jackson, MI 49201
 - b. CHIEF EXECUTIVE: Mr. Michael Overton, County Administrator
(517) 788-4335
moverton@co.jackson.mi.us
120 W. Michigan Avenue
Jackson, MI 49201
6. POPULATION OF TARGET AREAS
32,704 (City of Jackson)
7. OTHER FACTORS

Other Factors	Page #
Community Population is 10,000 or less	N/A
The applicant is or will assist a federally recognized Indian Tribe or United States Territory	N/A
The priority brownfield sites are impacted by mine-scarred land	N/A
The priority site is adjacent to a body of water	1-3
The priority site is in a federally designated flood plain	2
The redevelopment of the priority sites will facilitate renewable energy from wind, solar, or geothermal, or any energy efficiency improvement projects	N/A
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield sites in the target area	9
8. LETTER FROM STATE OR TRIBAL ENVIRONMENTAL AUTHORITY (Attached)



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

November 4, 2019

Mr. Michael Overton
County Administrator
Jackson County
120 West Michigan Avenue
Jackson, Michigan 49201

Dear Mr. Overton:

SUBJECT: Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Acknowledgment of a United States Environmental Protection Agency (US EPA)
Brownfield Assessment Grant Proposal for 2020

Thank you for your notice and request for a letter of acknowledgment for Jackson County's proposal to the US EPA Brownfield Grant Program. EGLE's Remediation and Redevelopment Division (RRD), encourages and supports county-wide assessment and redevelopment efforts. The RRD recognizes Jackson County's success in facilitating brownfield redevelopment using its previous grants and the need for additional assessment funding to continue those efforts.

Jackson County is applying for a \$300,000 hazardous substances and petroleum assessment grant which could be used to conduct assessment activities at eligible brownfield sites and facilitate redevelopment. As a general purpose unit of local government, Jackson County is an eligible grant applicant.

Should the US EPA award a brownfield grant to Jackson County, it would stimulate redevelopment and reuse of underutilized and contaminated properties and improve the economic development and environmental conditions in the county. If you need further information or assistance regarding specific brownfield sites, or any of EGLE's brownfield programs, please feel free to contact me at the number below or by email at SmedleyR@Michigan.gov.

Sincerely,

Ronald L. Smedley
Brownfield Redevelopment Coordinator
Remediation and Redevelopment Division
517-284-5153

cc: Mr. Matt Didier, US EPA Region 5
Ms. Amy Guerriero, The Enterprise Group

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area

Jackson County is located in south-central Michigan, midway between Chicago and Detroit. Jackson County is a rural county and contains only one city, Jackson. Industry was historically located within the city limits, clustered around the Grand River, which passes through the city's center. The abundance of water from the Grand River was an attractive resource to Jackson's earliest industries. Today, many of the early factory sites are vacant, blighted, or underutilized. They hide the riverfront from public view, pose a risk to the environmental condition of the river from leaching contaminants and contaminated storm water runoff, and are a threat to public health in nearby neighborhoods. The fear of environmental cleanup liability keeps these properties from being sold or acquired—leaving buildings in place that increasingly become more dilapidated from lack of investment and maintenance.

The target area for this Assessment Grant is an area extending along the Grand River in downtown Jackson. This target area is best geographically described as **Ward 5 of the City of Jackson** and encompasses Census Tracts 2 and 6, of which Census Tract 6 is an Opportunity Zone. The target area contains the historical downtown business district, the Grand River running through the city's center, older industrial lands along the river, and a neighborhood that once was the working-class housing for the former industrial properties. It is a 0.25-square-mile area (162 acres), containing some 345 individual parcels of land, and is one of the poorest neighborhoods in the City of Jackson with a poverty rate of 52.6%.

The community is working to ensure that the downtown area is a vibrant, attractive center of business and culture. There is new investment in the core downtown business district, but investment in the remainder of the target area has greater challenges due to a greater density of sites with environmental conditions, blighted conditions, and perceived development complications. The focus of this grant will be to support these complex redevelopment projects by providing better information to remove uncertainty surrounding site conditions; developing re-use plans that provide direction, detail, and budgets for redeveloping and using these sites safely; and aligning resources that carry redevelopment beyond the assessment and planning stages.

1.a.ii. Description of the Priority Brownfield Site(s)

The State of Michigan maintains a GIS-based inventory of contaminated and at-risk sites, which includes properties with known contamination, leaking underground storage tank sites, and brownfields. According to the state's databases, there are 95 listings within the target area. This represents a high concentration of environmental sites of concern that exists nowhere else in Jackson County. The number of sites reflects the multitude of historical industrial activities performed in the target area. The following priority sites have been identified either based on the severity of their current environmental conditions or their likelihood of redevelopment in the near future.

Michner Plating is a former electroplating facility that sits on the banks of the Grand River. It is a large, multi-story industrial site consisting of many interconnected buildings. The property was previously abandoned and has since reverted to the county through tax foreclosure. Upon taking possession of the site, the county discovered hundreds of abandoned containers, which led to a U.S. EPA Time Critical Removal Action. State-funded assessment of the property has found chlorinated solvent contamination in soil, groundwater, and the adjacent Grand River surface waters. Polyfluoroalkyl substances (PFAS) were also detected in groundwater at significant concentrations. There are allegations of buried drums that have yet to be investigated, and reportedly a fuel oil tank filled with spent chromic acid is abandoned beneath the building. Additionally, asbestos, cyanide-contaminated dusts, and crystallized metal salts remain within process equipment at the site. These

contaminants present acute risks to vagrants and children who frequently access the site. The acute risks to human health and the Grand River need further assessment. The community would like to see this structure demolished since it has no development potential as is. This would allow for multiple potential end uses, one possibility being public greenspace. Due to the complexity of this site, the community led efforts to nominate listing of this site on the Superfund National Priorities List, which we understand would render it ineligible for use of these grant funds. However, should that listing not come to fruition, this grant could be used to advance further assessment of this site, particularly to better understand immediate risks to human health and the environment, which is why this site is a priority. This site is in a special flood hazard area (i.e., flood plain).

Located on the Grand River and adjacent to the floodway, the former **Acme Industries** site is one of the oldest manufacturing sites in the City of Jackson. It originally produced farm implements and wagons but was later used by a manufacturer of heating and cooling equipment. The site is now a fenced, vacant 5-acre lot amid a growing arts-based neighborhood development project. Site investigations have found carbon tetrachloride, chlorinated solvents, and heavy metals. These contaminants represent a vapor intrusion risk, and further assessment and re-use planning are needed to develop the site. Future plans for this property include a commercial development or restaurant, possibly incorporating historic elements and art culture that exist at adjacent properties. Various parties have expressed interest in this site, and the grant would provide a resource to help those parties make plans for the appropriate cleanup actions that would allow development to move forward.

The first **State Prison** in Michigan was constructed on the banks of the Grand River just north of the Acme Industries site. The prison housed many industries that used the free prison labor. The 10.4-acre site was subsequently used as an armory and two remaining buildings were used for vehicle maintenance activities. These uses have resulted in environmental contamination of the site with solvents, fuels, and heavy metals. Jackson County acquired the grounds and two of the remaining buildings in 2019 with hopes to spur development on portions of the property. The county has determined the best option moving forward to be redevelopment of one of the buildings as a brewery, indoor farmers market, or restaurant to serve the neighborhood. This building was historically used as the commissary for the prison, and subsequently as a vehicle maintenance building. The presence of solvent contamination currently creates a vapor intrusion hazard, and asbestos-containing building materials hinder development plans. With the assessment grant, the county hopes to complete the cleanup planning activities for the commissary so that this property can be ready for developers.

Four former gasoline underground storage tank sites with immediate development potential have also been identified in the target area.

- **Howard's Radiator Service** has a documented release resulting in benzene, copper, lead, toluene, and ethylene glycol contamination. Despite the site's high development potential, this known environmental contamination has kept investment from occurring on the property. The site is a priority based on the known contamination being adjacent to the river and its development potential, but updated, more in-depth assessment of site conditions is needed to move forward. This site is in a special flood hazard area (i.e., flood plain).
- Preliminary investigations have identified at least one remaining underground storage tank at the **Mechanic Street Car Wash**. An adjacent business is interested in acquiring the site to expand its business footprint. However, the cost to conduct an environmental assessment at the site is expected to be more than the property value, and thus acquisition has not yet occurred. The site has been prioritized in order to assist the neighboring business to acquire the site, remove the blighted structure, and complete the necessary tank removal and cleanup actions.
- The former **Ace Auto** site is across the street from the former Acme Industries property. The City of Jackson previously took title of the Ace Auto site through tax foreclosure, has demolished the structures, and now would like to market the property for redevelopment. An adjacent business is

interested in acquiring the property and constructing a new commercial development on site. There is no environmental data for this site, and the grant would be a valuable resource to assist the adjacent business in its acquisition.

- The **Trail Street Gas Station** site is a long-abandoned gas station. An extremely small building is present on the site that lacks wide-spread commercial appeal, but several small entrepreneurs have independently approached the city or county in the past to pursue redevelopment of the site as a coffee shop. No environmental data exists on this site, and it is nestled amongst residential properties. The lack of data makes assessment of this site a priority as it may represent a health hazard to the local neighborhood. Local residents have communicated their desire for the site to be developed as it is currently used by a motorcycle club, an inappropriate use for the neighborhood.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

The main goal of this project is to enhance the traditional downtown along the riverfront area. The target area has recently seen new investment through development at the fairgrounds, new apartment buildings, a newly constructed neighborhood health center, and upgrades to buildings throughout the target area. We believe the assessment grant adds momentum to a neighborhood revitalization effort that is currently underway. We envision supporting projects in the target area that help transform properties into mixed-use developments or neighborhood businesses. Economic development, safe communities, and healthy communities are the top three goals of Jackson County's Strategic Plan. This project is aligned with those goals in that the grant will directly assist in acquisition and development of the priority sites, remove blighted structures that can make neighborhoods unsafe, and address environmental conditions that add risk to the health of a population already disproportionately at risk. This project is also fully aligned with the City of Jackson's adopted Community Master Plan. This award-winning plan (Daniel H. Burnham Award, Michigan Association of Planners) provides the vision and framework for the investment priorities and growth in the city and was a highly collaborative effort. One of the outcomes of the Master Plan was an agreement that a healthy downtown in the City of Jackson is vital since it is the only city in the region; furthermore, it needs to be a vibrant, diverse center of commerce, entertainment, business, recreation, housing, and transportation. The priority sites have demonstrated development potential to support and expand existing commercial businesses. Conversations with adjacent businesses have already been conducted to garner interest and support. The proposed end uses are consistent with land use and zoning ordinances in place.

1.b.ii. Outcomes and Benefits of Reuse Strategy

The southern half of the target area (Census Tract 6) is one of four Opportunity Zones in Jackson County and encompasses the core downtown business district. By focusing our projects within and surrounding the business district, the grant can help create a vibrant, diverse urban center within the Opportunity Zone. Further, we expect secondary development from projects supported by the grant, creating additional investment. As an example, two new mixed-use residential developments within the Opportunity Zone have created interest in investment at adjacent properties to serve the new residents. If awarded, the grant may be available to assist in one or more of these non-priority sites.

Anticipated outcomes from the projects include new jobs, increased available tax revenues to the county and city, and leveraged investment. These projects would restore approximately 20 acres of urban land to productive use. From past projects and preliminary discussions with developers, we have extrapolated the following expected metrics for the envisioned priority sites.

Priority Area/Site	Potential Investment	New Job Creation	New Tax Revenues
Michner Plating	N/A	N/A	N/A
Former Acme Site	\$3,000,000	20–30	\$25,000/year
State Prison	\$2,000,000	10–30	\$25,000/year
Howard’s Radiator	\$1,000,000	5–10	\$15,000/year
Mechanic St. Car Wash	\$100,000	1–2	\$10,000/year
Ace Auto	\$2,000,000	10–20	\$20,000/year
Trail St. Gas Station	\$250,000	1–2	\$10,000/year

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse

The county is an eligible grantee for several funding sources that can be deployed in the target area. The Michigan Department of Environment, Great Lakes, and Energy makes funding available to communities for meaningful brownfield redevelopment projects. The state can provide up to \$2,000,000 per project, typically as a grant and loan. Brownfield Assessments are available to a community at no cost, funded through the state’s Section 128(a) allocation. Jackson County has successfully utilized this resource in the past. Tax increment capture programs are available for brownfield sites in Michigan using local and state taxes generated from redevelopment. These are highly attainable funds requiring only the support of the local municipality to capture “local taxes” which can be used for demolitions, cleanup, and redevelopment costs. Direct assistance to brownfield projects is also available through Michigan’s Community Revitalization Program, which provides funding for up to 25% of a project’s investment. Michigan’s Business Development program provides direct incentives to large job creation projects with the amount of incentive based on the number and average wage of the newly created jobs. The City of Jackson is a Community Development Block Grant (CDBG) Entitlement Community and can use CDBG funding for eligible redevelopment activities on the priority sites. The Jackson County Brownfield Redevelopment Authority has secured funding to pay for the cost of staff to manage the grant. This benefit, estimated at \$6,000 annually, allows us to primarily utilize grant funds for eligible assessment and re-use planning activities.

1.c.ii. Use of Existing Infrastructure

The target area is an urban area with existing infrastructure including transportation systems (roads, sidewalks, public transportation) and utilities (sewer, water, natural gas, electric, fiber optic). Therefore, redevelopment of the priority sites will not require expansion or upgrades to infrastructure because adequate capacity is already present.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community’s Need for Funding

The City of Jackson is an eligible distressed area through the Michigan State Housing Development Authority, meaning it exhibits economic distress at higher than statewide average levels. Census Tract 2 in the target area has higher unemployment (21.9%) than state and national rates, a higher percentage of people living in poverty (52.6%) than state and national rates (15.6% and 14.6%, respectively), and significantly lower median household incomes (\$18,954) than state and national averages (\$52,668 and \$57,652, respectively). Assessed and equalized property values countywide have stayed relatively flat over the past several years with a significant decrease in the value of industrial properties between 2018 and 2019 (12.11%, a loss of \$22 million in value). These factors impact the county’s ability to draw upon income and property tax revenues to carry out brownfield

redevelopment projects. There has also been a continued decrease in allocations for both CDBG and HOME Investment Partnership funds, which severely diminishes the funds available and negatively affects the city's ability to assist its neighborhoods. Further, outside the City of Jackson, Jackson County is a rural county composed of many small village and township governments that lack the expertise and experience necessary to manage their local brownfield sites. These small population areas rely on the county to help address local needs.

2.a.ii. Threats to Sensitive Populations

2.a.ii.(1) Health or Welfare of Sensitive Populations

The target area is a low-income neighborhood situated amongst industrial properties. The homes within the neighborhood are generally 1900s vintage construction and were originally built as working-class housing for the nearby former industries. These residences are small and in most cases owner-occupied—the vast majority with taxable values less than \$20,000. Young children living in these older homes have an increased risk of lead poisoning and asbestos exposure. Children under the age of 5 make up a large portion (12.9%) of the target area population.

In fact, the entire neighborhood population is relatively young. Approximately 41% of the population in the target area is under the age of 18, and 29% of the females are of childbearing age (18–40 years old). This population is at greater risk for environmental threats that have an effect on child and prenatal development, such as sites with petroleum and chlorinated solvent contamination (which is present at several of our priority sites), which can pose a risk through vapor intrusion into homes and other buildings.

The target area is 37.4% minority, mostly African American and Hispanic/Latino. Census data show these segments of the neighborhood are more likely to be in poverty (88.6% and 65%, respectively) than their White counterparts (41.9%).

There are numerous vacated properties within the target area including the priority sites. These properties have become safe havens for illicit activities, and as expected the target area has higher occurrences of violent crimes than other areas in the City of Jackson (source: Jackson County GIS). Additionally, there are no parks, school playgrounds, or publicly accessible greenspaces within the neighborhood. Since there is a large population of young children in this community, the lack of recreational space has the potential for adverse impacts on their health.

This grant will facilitate the assessment of contaminated sites in the target area so that risks can be identified and evaluated for further action. Restoration of properties to productive use provides access to jobs for this community and helps to remove places where criminal activity can take place. Thus, this grant is consistent with the county's goals of supporting economic development (job creation) and creating healthier and safer communities.

2.a.ii.(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

The 2017 Jackson County Community Health Needs Assessment (CHNA) indicates that obesity and the lack of physical activity are two of the top health needs of the community. Among Jackson County residents, 40% are classified as obese, which is higher than Michigan's overall rate of 32%. Only 28% of county residents meet the national guidelines for physical activity, and just 10% meet the national guidelines for fruit and vegetable consumption. Limited access to healthy food also contributes to these health risks. The target area is identified as a food desert by the U.S. Department of Agriculture, and the lack of a grocery store within the target area contributes to this health risk. One of the potential development options the county is considering for the former Prison Commissary building is a farmers market, which would help address this health risk. If we can advance the conversion of the Michner Plating site to include a public greenspace, that too will help create space for increased physical activity.

According to the County Health Agency, cancer is the second leading cause of death in Jackson County (256.2 per 100,000), significantly higher than Michigan's statewide rate (211.1). According to the County Health Profile, the county is also higher than state averages in the frequency of chronic lower respiratory diseases and heart disease. This appears to be a function of dietary factors, physical inactivity, and a higher than average smoking rate among adults. Women of childbearing age in the target area are a sensitive population susceptible to the effects of various environmental contaminants, and county data shows that the infant death rate is higher (9.6 per 1,000 live births) than the state (6.4 per 1,000). Sites with environmental contaminants that include carcinogenic solvents and petroleum add to these risks, and the grant can help facilitate the identification of areas of contamination and appropriate responses to mitigate exposures.

The older housing stock in the target area exposes citizens, especially children, to risks of lead poisoning. Much has been done throughout the county (particularly in the city) to educate and abate lead-based paint hazards. There has been significant blood lead level testing of children ages 1–2 with 1.9% of those tested having confirmed elevated blood lead levels, slightly higher than the state (1.6%).

Additionally, the African American minority population in the target area is more prone to suffer from asthma, and identification and control of those contaminant sources in the area can help reduce conditions that adversely impact that sensitive group, particularly children.

If the grant-funded assessment data demonstrates a direct risk to citizens, data will be forwarded to the Michigan Department of Environment, Great Lakes, and Energy and Local Health Department which can directly address confirmed exposures by providing bottled water, installing vapor mitigation systems, and conducting other appropriate measures. The County's Environmental Health Director co-chairs the Michigan Association of Local Environmental Health Administrators Vapor Intrusion Response committee. The committee is intended to create a Best Practices Template for Vapor Intrusion Response Activities. As such, we have local resources to assist property owners, developers and local government with appropriate responses to identified risks.

2.a.ii.(3) Disproportionately Impacted Populations

The target area population is 37.4% minority, which mostly comprises individuals of African American and Hispanic/Latino ethnicities. Census data show these segments of the neighborhood are more likely to be in poverty (88.6% and 65%, respectively) than their White counterparts (41.9%). Regardless of race, the target area has significantly higher poverty rates (52.6%) than the county (15.2%), state (15.6%), and nation (14.6%). The grant can help address the disproportionate poverty by creating local opportunities for jobs through the successful redevelopment of our priority sites.

Demographic data shows that residents in the target area are more likely to utilize community services than their counterparts elsewhere in the county. Children ages 0–5 in the City of Jackson use the Family Independence Program (which provides temporary cash assistance to families with children and pregnant women), the Food Assistance Program, and Subsidized Care at rates higher than elsewhere in Michigan. At Bennett Elementary School, which serves the target area, 93% of all 2019 fall enrollees are entitled to free or reduced-price lunch benefits. Fortunately, access to social services is readily available within the target area (Family Health Services, United Way, and Goodwill). The target area also has a Walk Score of 97 out of 100, making these services very accessible. A countywide transportation system serves the target area, providing adequate public transportation to employment centers, educational facilities, and recreational locations throughout the community.

2.b. Community Engagement

2.b.i.–2.b.ii. Project Partners and Project Partner Roles

Partner Name/Point of Contact	Specific role in the project
Jackson Area Manufacturers Association Bill Rayl, (517) 782-8268 x 103 brayl@mijama.org	Communication with manufacturing community
The Enterprise Group of Jackson Tim Rogers, (517) 788-4456 trogers@enterprisegroup.org	Connecting developers to brownfield sites, local government communications
Community Action Agency (CAA) Toby Berry, CEO, (517) 784-4800 Tberry@caajlh.org	Communications with the target area neighborhood, help secure feedback on community needs
Jackson County Environmental Health Don Hayduk, (517) 788-4433 ehealth@co.jackson.mi.us	Education and outreach regarding environmental health risks, response to immediate risks
Michigan Works! Southeast Bill Sleight, (517) 552-2100 wsleight@mwse.org	Connect employers to local residents seeking employment, access to State job training resources

2.b.iii. Incorporating Community Input

We will work closely with Community Action Agency (CAA) to communicate with the target area. CAA is an agency managing various anti-poverty programs including early education, economic self-sufficiency, safe housing, and health and nutrition programs. CAA has a robust website, newsletter, and physical office within city limits that allows them to communicate effectively with the target area. They are a trusted community partner and can help us garner input from the target area citizens about specific concerns and ideas for redevelopment projects. Further, we can work with the City Council Ward Representative for the target area to coordinate and/or host informational meetings.

The grant will be implemented by the Jackson County Brownfield Redevelopment Authority (Authority), an entity that holds open, public meetings monthly. While meeting notices and agendas are regularly posted and available online, because this grant has a geographic focus, we will also enhance our communications in the target area. We will post notices of public meetings at local establishments in the target area such as the Center for Family Health, United Way offices, and Goodwill. The Authority maintains a website and utilizes social media to post information, Brownfield Plans, progress reports, and meeting minutes. This website also provides links to technical information, staff contact information, notices of open meetings where public participation is invited, and other resources that inform citizens of specific issues at local sites and the resources to help them understand, evaluate, and voice their concerns about brownfields in their neighborhood. The county's Environmental Health Director is a regular attendee at these meetings and is an accessible resource if communications or response actions are needed with the public regarding complex or sensitive public health issues. Additionally, we may reach out to Technical Assistance for Brownfield Communities (TAB) and/or the Agency for Toxic Substances and Disease Registry (ATSDR) to assist. We have established repositories for technical documents at the public library and disclose technical reports to the state, thereby making information available to the public.

Communications are also directed at the business community to ensure they are informed of redevelopment opportunities on brownfield sites and the potential incentives available through the Assessment Grant and county's Brownfield Redevelopment program. For these communications, we rely on our partnerships with The Enterprise Group of Jackson, Jackson Area Manufacturers Association, and others utilizing their regular meetings and newsletters. In preparation for this grant proposal, the Authority hosted a "Community Redevelopment Progress Report" event in September

2018 that brought together local citizens, leaders, elected officials, the state environmental agency, and the U.S. EPA Region 5 to show progress made with a prior assessment grant. At this event, there were opportunities for citizens to point out specific sites and voice other concerns. We envision a similar event occurring in the first year of the grant term involving all project partners.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs

3.a.i.–3.a.iv. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, Outputs

Task 1: Programmatic and Community Engagement
i. Project Implementation: <ul style="list-style-type: none"> Attendance at National Brownfield Conference. Engage Project Partners in semi-annual communications, host outreach event in first year. Quarterly Performance Reporting, Financial Reports, etc. The following non-EPA grant resource is needed to carry out this task: cost of staff for Brownfield Redevelopment Authority (BRA) from County BRA funds (\$6,000/year).
ii. Anticipated Project Schedule: Community Engagement Event in first year, ongoing regular reporting and communications quarterly throughout the grant period
iii. Task/Activity Lead(s): Jackson County, Contracted Environmental Professional
iv. Output(s): documents from Community Engagement (e.g., survey responses, informational brochures), Quarterly Reports, Financial Reports, communications by Project Partners
Task 2: Phase I and II Environmental Site Assessments
i. Project Implementation: <ul style="list-style-type: none"> Environmental Assessments of priority sites including All Appropriate Inquiry (AAI); soil, groundwater, and soil gas testing; removal of underground storage tanks; hazardous material surveys; and similar technical evaluations to determine presence and magnitude of contamination (three hazardous substance sites, four petroleum sites). Similar EPA-funded activities may be conducted at one non-priority site.
ii. Anticipated Project Schedule: ongoing
iii. Task/Activity Lead(s): Contracted Environmental Professional
iv. Output(s): Quality Assurance Project Plan, Phase I and II Environmental Site Assessment Reports, Assessment, Cleanup, and Redevelopment Exchange System (ACRES) updates, AAI checklists, Sampling Plans, Health and Safety Plans
Task 3: Re-Use Planning
i. Project Implementation: <ul style="list-style-type: none"> Liability Protection Documentation, Plans for Response Activities, property management plans for construction activities, post-construction care of property, evaluation of due care and ongoing obligations, required notices. Similar EPA-funded activities may be conducted at one non-priority site.
ii. Anticipated Project Schedule: ongoing
iii. Task/Activity Lead(s): Contracted Environmental Professional
iv. Output(s): technical documents, copies of notices, etc.

3.b. Cost Estimates

3.b.i.–3.b.iii. Development of Cost Estimates, Application of Cost Estimates, Funds Allocated Toward Environmental Site Assessments

Hazardous Substances Grant Budget (\$150,000)				
Budget Categories	Task 1: Programmatic and Community Engagement	Task 2: Phase I and II Environmental Site Assessments	Task 3: Re-Use Planning	Total
Travel	\$1,000	\$0	\$0	\$1,000
Contractual	\$7,500	\$80,000	\$61,500	\$149,000
Total Direct Costs	\$8,500	\$80,000	\$61,500	\$150,000
Indirect Costs	\$0	\$0	\$0	\$0
Total Budget	\$8,500	\$80,000	\$61,500	\$150,000
Petroleum Grant Budget (\$150,000)				
Travel	\$1,000	\$0	\$0	\$1,000
Contractual	\$7,500	\$80,000	\$61,500	\$149,000
Total Direct Costs	\$8,500	\$80,000	\$61,500	\$150,000
Indirect Costs	\$0	\$0	\$0	\$0
Total Budget	\$8,500	\$80,000	\$61,500	\$150,000

Task 1: Programmatic and Community Engagement

- Travel costs: Travel to two National Conferences includes fees (\$500), hotel (6 nights @ \$125 = \$750 total), transportation and per diems (\$750); total \$2,000 split evenly between grants.
- Contractual costs: 12.5 hours average per quarter @ \$100/hr. for 12 quarters = \$15,000 split evenly between grants.

Task 2: Phase I and II Environmental Site Assessments

- Contractual costs: 8 Phase I Environmental Assessments at \$3,000 = \$24,000, 8 Phase II Environmental Assessments at average cost of \$17,000 = \$136,000; total \$160,000 split evenly between grants.

Task 3: Re-Use Planning

- Contractual costs: 8 liability protection, property management plans at an average cost of \$15,375 = 123,000 split evenly between grants.

3.c. Measuring Environmental Results

Staff regularly tracks various outcomes of the redevelopment projects to report annually to the State of Michigan. Information is typically gathered at the time developers make an application for the use of funds and is confirmed after construction. Metrics include construction size, investment amounts, efforts to secure jobs for local residents, job creation, wages, cleanups, and other metrics. These numbers are tallied to track progress toward the objectives of this program. We also utilize the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database and Quarterly Report formats to track and report progress to EPA and project partners. Evaluations include progress toward the number of priority sites addressed, quality and quantity of engagements with public and project partners, financial performance, and other relevant parameters.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i.–4.a.ii. Organizational Structure and Description of Key Staff

The grant will be implemented by the Jackson County Brownfield Redevelopment Authority (Authority). The Authority is staffed by The Enterprise Group of Jackson, a countywide economic development agency. Staff at Jackson County and The Enterprise Group of Jackson have managed previous U.S. EPA brownfield assessment and Revolving Loan Fund grants. Project Director Amy

Guerriero has over 20 years of direct experience with brownfield redevelopment and managing brownfield redevelopment authorities. As economic development professionals, staff have direct opportunities with developers and expanding industries that may be interested in brownfield sites. The Enterprise Group widely broadcasts regular progress updates and dashboards to show economic development success, including those projects that are brownfield redevelopment projects. The Authority will retain the services of a Professional Environmental Services firm to implement work under the grant. The Authority is governed by a board that oversees staff activities, selection of environmental services providers, grant expenditures, and project approvals.

4.a.iii. Acquiring Additional Resources

The county, Authority staff, and board have experience in soliciting and selecting environmental professional services to provide the technical expertise needed to execute grant-funded work. Having managed several EPA grants, we know what qualities are needed from the contractor. The Authority has non-EPA funding to pay for staffing which in the past has averaged about \$6,000 per year. That cost and contract is annually renewed.

4.b. Past Performance and Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant

4.b.i.(1) Accomplishments

Jackson County has previously implemented six EPA brownfield grants including assessment grants in FY 1999, FY 2004, FY 2008, and FY 2015, as well as Revolving Loan Fund grants in FY 2001 (Pilot) and FY 2009. The FY 2015 Assessment Grant allowed the community to investigate 19 different properties, spurred \$14.25 million in investment, created 111 new jobs, and retained an additional 154 jobs. As a result of the grant-funded projects, developers completed cleanup activities at several sites, three previously unknown underground storage tanks were identified and removed, and one leaking underground storage tank site was able to achieve regulatory “closure.” The FY 2009 Revolving Loan Fund (RLF) grant was used to spur the removal of two large, blighted buildings in downtown Jackson. The targets of the RLF were a 9-story hotel and 11-story office building, where funds were used to remove asbestos-containing building materials. \$788,000 of the \$1,000,000 RLF grant was expended. There was some difficulty in finding projects for the use of RLF funds, primarily due to economic conditions in Michigan in 2009. The FY 2008 assessment grant resulted in the assessment of 17 sites. Grant-funded work leveraged \$46,500,000 in new investment, including a \$30 million airport re-alignment project. With the support of the grant, the project resulted in the retention of 128 jobs and the creation of 225 new jobs. The grant helped leverage a major cleanup of an uncontrolled dumpsite at the airport, which was supported with a \$1,000,000 loan from the state for cleanup activities. The state also lent technical expertise and laboratory services for a major investigation project (Acme site) using the state’s Section 128(a) allocation. All grant funds were expended within the term of the grant.

4.b.ii.(2) Compliance with Grant Requirements

Jackson County has always met its grant obligations for timely quarterly reporting, financial reporting, MBE/WBE utilization, and ACRES reporting. All assessment grant funds were expended within the term of those grants. Jackson County routinely disclosed outputs of the grants to the U.S. EPA, as well as the state of Michigan.

Threshold Criteria

THRESHOLD CRITERIA RESPONSE

JACKSON COUNTY, MICHIGAN

1. **APPLICANT ELIGIBILITY** - The applicant is a County, a general-purpose unit of government, and is thus an eligible entity for an Assessment Grant

2. **COMMUNITY INVOLVEMENT** - The grant will be implemented by the Jackson County Brownfield Redevelopment Authority (Authority), an entity that holds open, public meetings monthly. While meeting notices and agendas are regularly posted and available online, because this grant has a geographic focus, we will also enhance our communications in the target area. We will post notices of public meetings at local establishments in the target area such as the Center for Family Health, United Way offices, and Goodwill. The Authority maintains a website and utilizes social media to post information, Brownfield Plans, progress reports, and meeting minutes. This website also provides links to technical information, staff contact information, notices of open meetings where public participation is invited, and other resources that inform citizens of specific issues at local sites and the resources to help them understand, evaluate, and voice their concerns about brownfields in their neighborhood.

We will work closely with Community Action Agency (CAA) to communicate with the target area. CAA is an agency managing various anti-poverty programs including early education, economic self-sufficiency, safe housing, and health and nutrition programs. CAA has a robust website, newsletter, and physical office within city limits that allows them to communicate effectively with the target area. They are a trusted community partner and can help us garner input from the target area citizens about specific concerns, ideas for redevelopment projects, etc. Further, we can work with the City Council Ward Representative for the target area to coordinate and/or host informational meetings.

Regarding complex or sensitive public health issues, the county's Environmental Health Director is a regular attendee at these meetings and is an accessible resource if communications or response actions are needed with the public. Additionally, we may reach out to Technical Assistance for Brownfield Communities (TAB) and/or the Agency for Toxic Substances and Disease Registry (ATSDR) to assist. We have established repositories for technical documents at the public library and disclose technical reports to the State, thereby making information available to the public.

Communications are also directed at the business community to ensure they are informed of redevelopment opportunities on brownfield sites and the potential incentives available through the Assessment Grant and county's Brownfield Redevelopment program. For these communications, we rely on our partnerships with The Enterprise Group of Jackson, Jackson Area Manufacturers Association, and others utilizing their regular meetings and newsletters. In preparation for this grant proposal, the Authority hosted a "Community Redevelopment Progress Report" event in September 2018 that brought together local citizens, leaders, elected officials, the state environmental agency, and the U.S. EPA Region 5 to show progress made with a prior assessment grant. At this event, there were opportunities for citizens to point out specific sites and voice other concerns. We envision a similar event occurring in the first year of the grant term involving all project partners.

3. Jackson County does not have an active Assessment Grant. Our most recent brownfield grant was in FY2015 and all funds were utilized.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

12/03/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

BF

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Jackson County, Michigan

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

0883288770000

d. Address:

* Street1:

120 W. Michigan Avenue

Street2:

* City:

Jackson

County/Parish:

Jackson

* State:

MI: Michigan

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

49201-1502

e. Organizational Unit:

Department Name:

Jackson County BRA

Division Name:

Brownfield Redevelopment Auth.

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mrs.

* First Name:

Amy

Middle Name:

* Last Name:

Guerriero

Suffix:

Title: Vice President of Economic Development

Organizational Affiliation:

JCBRA Executive Director

* Telephone Number:

517-788-4458

Fax Number:

* Email:

aguerriero@enterprisegroup.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-19-05

* Title:

FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Community-wide assessment of potential petroleum and hazardous substance contaminated brownfields in Jackson County, Michigan.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: